



restricted  
90-314  
92-100

July 8, 1992

Thomas E. Wheeler  
President/CEO

Commissioner Ervin S. Duggan  
Federal Communications Commission  
Room 832, 1919 M Street, N.W.  
Washington, D.C. 20554

RECEIVED ORIGINAL  
JUL 17 1992 FILE

Federal Communications Commission  
Office of the Secretary

Dear Commissioner Duggan:

Press reports indicate that the Commission is currently considering a licensing plan for personal communications services (PCS) based upon nationwide as well as regional licensees. We urge you to reject this structure on the grounds that it disadvantages potential consumers of PCS who do not live in big cities, denies entrance to entities other than corporate behemoths and eliminates competition from wireline cellular providers.

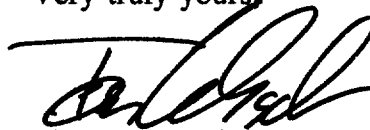
In its cellular licensing plan the Commission chose to create 734 license areas. The result of these "bite size" license areas was that every area now has within it an operational cellular system. These systems are owned by over 180 different companies of varying sizes. If, for instance, the Commission should adopt (as is reported) the 47 Rand McNally Trading Areas or, worse yet, grant one or more national cellular licenses, only a corporate giant will be able to finance construction of such a huge area. And even a corporate giant will be hard pressed to provide rapid service in rural as well as urban areas.

The Commission's cellular licensing model was a success. Rural and urban America both received service in record time. In only eight and one half years consumers went from no cellular service to service in every license area. Cellular service has exceeded even its greatest proponents' expectations. Why change the methodology which has proven so successful?

Enclosed is a map which shows existing cellular license areas as well as the 47 Rand McNally Trading Areas. Not only do these trading areas split existing cellular license areas, they also ignore LATA boundaries which effectively bar the Bell Operating Companies, and their affiliates, from these new licenses, thereby sheltering the new PCS licensee from competition.

We hope this map is helpful in quantifying an heretofore abstract concept. Bigger is not better when it comes to serving all of America as quickly as possible and stimulating competition.

Very truly yours,



Thomas E. Wheeler

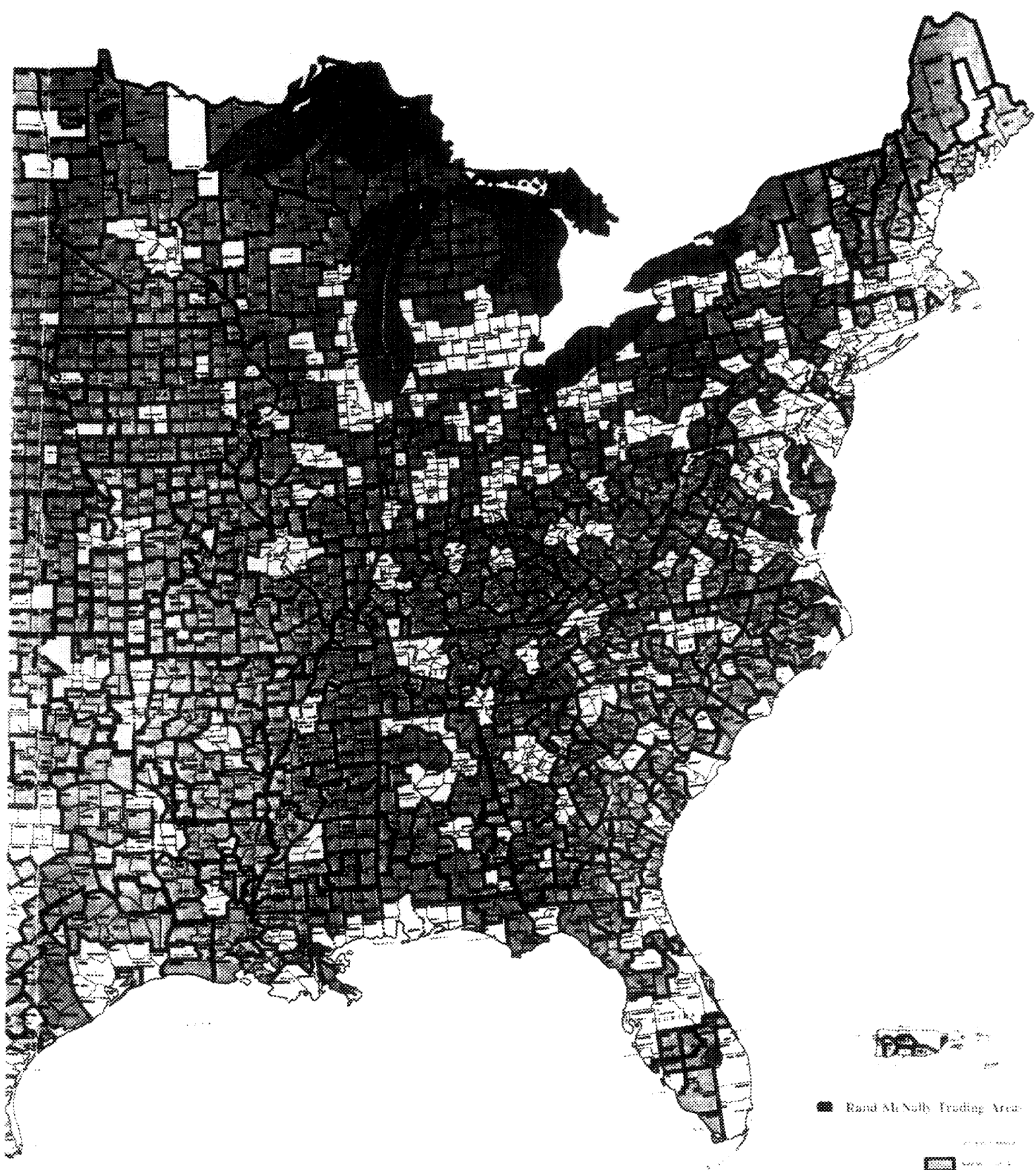
Enclosure


Cellular Telecommunications Industry Association

1133 21st St. N.W., Third Floor, Washington, D.C. 20036 • (202) 785-0081 • FAX (202) 785-0721



recycled paper



 Rand McNally Trading Area

The Rand McNally Trading Area is a collection of small, irregularly shaped regions that are shaded in various patterns. These regions are located throughout the United States and are used to represent different trading areas. The map is a detailed representation of these areas, showing their relative positions and shapes.

